

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

David Johnson,) C.A. No. 8:21-cv-00424-TMC-JDA
Plaintiff,)
v.) **PLAINTIFF'S ANSWERS TO LOCAL
South Carolina Highway Patrol,) RULE 26.01 INTERROGATORIES**
Defendant.)
)

Plaintiff answers the Court's interrogatories pursuant to Local Rule 26.01, D.S.C., as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Answer: None known.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Answer: All of Plaintiff's claims are triable to a jury as Plaintiff requested.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: None

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: This action was removed by Defendants to this Court. Plaintiff

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

Answer: Defendant is not aware of any related actions.

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(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: Defendant is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Answer: Not known.

Respectfully submitted,

s/Peter A. Rutledge

Peter A. Rutledge (SC Bar #15899)

(864) 906-2521

66 Faris Circle

Greenville, SC 29605

Peter@PRutLaw.com

ATTORNEY FOR PLAINTIFF

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